

The Honorable Tana Lin

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON

JESSICA PAYNE,

Plaintiff,

v.

UNIVERSITY OF WASHINGTON,
CATHRYN BOOTH-LAFORCE, PhD, in
her individual and official capacity, and
YVONNE LIN, PhD, in her individual and
official capacity,

Defendants.

No. 2:23-cv-01804 TL

JOINT STATUS REPORT AND
DISCOVERY PLAN

Pursuant to FRCP 26(f) and this Court's Order, through their undersigned counsel of record the parties jointly submit the following Status Report and Discovery Plan.

1. **Nature and Complexity of Case:** This matter is an employment discrimination lawsuit.

2. **Assignment of Magistrate:** No.

3. **Proposed Deadline For Joining Parties:** May 1, 2025.

4. **N/A.**

5. **N/A.**

6. **Discovery Plan:**

a. Initial Disclosures have been served.

b. Discovery subjects: The parties anticipate discovery related to the facts alleged and claims pled in Plaintiff's Complaint, her employment with

the University, and alleged damages.

c. No issues about electronically stored information.

d. The parties anticipate some documents / communications will be subject to attorney/client and/or work product privileges as applicable, but do not anticipate unusual issues related thereto.

i. Potential Conflict of Interest:

ii. Defendants' position: None at this time.

iii. Plaintiff's position: None at this time.

e. The parties do not propose any changes to discovery limitations imposed under Federal or Local Civil Rules or other proposed limitations on discovery.

f. The parties do not anticipate a need for discovery-related orders at this time. If discovery sought gives rise to the need for a Protective Order, the parties anticipate they can stipulate to the appropriate order.

7.

a. The parties have no specific proposals concerning prompt resolution.

b. ADR: The parties may mediate this matter but do not intend to do so under LR 39.1.

c. There are no related cases.

d. Discovery management: No anticipated issues.

e. Anticipated discovery sought: The parties anticipate discovery related to the facts alleged and claims pled in Plaintiff's Complaint, her employment with the University, and alleged damages, including but not limited to emails, records, and documents related to Plaintiff's employment.

f. Phasing motions: None.

g. Preservation of discoverable information: Defendants and Plaintiff are

1 aware of their obligations to preserve discoverable information.

2 h. Privilege issues: The parties anticipate some documents /
3 communications will be subject to attorney/client and/or work product
4 privileges as applicable, but do not anticipate unusual issues related
5 thereto.

6 i. Model Protocol for Discovery of ESI: Defendants are aware of
7 obligations to preserve electronic evidence and have produced
8 documents/emails in response to many public records requests.
9 Defendants request Plaintiff preserve all emails, texts, phone records,
10 computer records, and/or recordings related to the matters outlined in
11 the Complaint.

12 j. Alternatives to the Model Protocol: The parties anticipate discovery
13 can be conducted in accordance with the Federal Rules of Civil
14 Procedure.

15 8. Date by which discovery will be completed: September 26, 2025.

16 9. The case should not be bifurcated.

17 10. The parties agree pretrial statements and pretrial order called for by Local
18 Civil Rule 16 should be dispensed with in whole.

19 11. The parties do not intend to utilize the Individual Trial Program under Local
20 Civil Rule 39.2.

21 12. The parties may mediate this matter but do not intend to do so under Local
22 Civil Rule 39.1.

23 13. No other suggestions.

24 14. Date case will be ready for trial: February 2, 2025.

25 15. Trial will be a jury trial.

26 16. Number of trial days: 7-10 days.

17. Trial counsel contact information:

- a. Plaintiff's counsel:
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- b. Defendant's Counsel:
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18. Conflicted dates for trial setting:

- a. Plaintiff's Counsel:
 - i. December 22-26, 2025
 - ii. January 1, 2, 5-9, 12-16, 2026
- b. Defendants' Counsel:
 - i. April 14-18, 2025
 - ii. May 5-9, 2025
 - iii. May 27-30, 2025
 - iv. June 30-July 3, 2025
 - v. July 28-August 1, 2025
 - vi. August 11-15, 2025
 - vii. August 25-29, 2025
 - viii. October 6-10, 2025
 - ix. October 27-31, 2025
 - x. November 24-28, 2025
 - xi. January 5-9, 2026
 - xii. March 24-27, 2026

19. All defendants have been served.

20. The parties do not request a scheduling conference in advance of Court's entry of scheduling order.

21. N/A

22. Plaintiff's counsel and Defendants' counsel certify that they have reviewed Judge Lin's Chambers Procedures, the Local Rules, General Orders and applicable electronic filing procedures.

23. Plaintiff's counsel and Defendants' counsel certify that they have reviewed and are compliant with Judge Lin's Standing Order Regarding 28 U.S.C. Section 455 and Canon 3 of the Code of Conduct for United States Judges.

DATED: February 27, 2025

KEATING, BUCKLIN & McCORMACK, INC., P.S.

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CERTIFICATE OF SERVICE

I hereby certify that on the below date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Attorneys for Plaintiff

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and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants: N/A

DATED: February 27, 2025

/s/ Amanda Butler

Amanda Butler, WSBA #40473